

## REMARKS

The present application was filed on August 22, 2001 with claims 1 through 23. Claims 1 through 23 are presently pending in the above-identified patent application. Claims 1, 9, 15, and 18-23 are proposed to be amended and new claims 24 and 25 are proposed to be added herein.

In the Office Action, the Examiner objected to the disclosure due to indicated informalities, and objected to the drawings as failing to comply with 37 CFR 1.84(u)(1) because view reference "FIG. 4" is used to designate multiple views. The Examiner rejected claims 1-13 and 15-23 under 35 U.S.C. §102(e) as being anticipated by Carter et al. (United States Patent Number 6,026,474) and rejected claim 14 under 35 U.S.C. §103(a) as being unpatentable over Carter et al. in view of Humphrey (United States Patent Number 09/267,658).

### Formals Objections

The disclosure was objected to because it did not include the serial number of a patent application that was cross-referenced in the specification and because FIG. 5 was referenced in the disclosure but is not present in the drawings submitted on 12/04/2001.

The disclosure has been amended to include the serial number of the cross-referenced application. Applicants also note that FIG. 5 was mislabeled as FIG. 4 in the drawings submitted on 12/04/2001. FIG. 5 has been amended to correct the label on the drawing.

### Drawings

The drawings were objected to as failing to comply with 37 CFR 1.84(u)(1) because view reference "FIG. 4" is used to designate multiple views.

As noted above, FIG. 5 was mislabeled as FIG. 4 in the drawings submitted on 12/04/2001. FIG. 5 has been amended to correct the label on the drawing. Applicants believe that the amendments address the Examiner's concern and respectfully request that the objection to the drawings be withdrawn.

Independent Claims 1, 9, 15 and 18-23

Independent claims 1, 9, 15, and 18-23 were rejected under 35 U.S.C. §102(e) as being anticipated by Carter et al. Regarding claim 1, the Examiner asserts that Carter discloses a method for storing digital content in a client-side cache.

5 Applicants note that, as the Examiner acknowledges in rejecting claim 14, Carter does not disclose that remote client caches obtain content over a *broadcast connection*. The Examiner asserts, however, that this concept is well known, as evidenced by Humphrey.

10 Humphrey defines clients on two levels: (1) Internet Service Providers and corporate customers (elements 12a-c of FIG. 1); and (2) clients or internet participants who are clients of the Internet Service Providers and corporate customers (elements 13a-h of FIG. 1; see, paragraph 40). The information broadcast by Humphrey, however, is sent only to the level 1 Internet Service Providers and corporate customers (elements 25a-c of FIG. 2; paragraph 44). Users 13 who actually request and receive content are considered 15 level 2 clients (paragraph 40) and, as shown in FIG. 1, users 13 do not receive the content via a broadcast mechanism. In the present invention, however, the content is *broadcast to an Internet client who is a user*, and stored in a *client-side cache, such as in the user PC 300* shown in FIGS. 1, 2, and 3. Independent claims 1, 15, 18, 20, 21, and 23 require 20 storing content broadcast to a *client* in said *client-side cache*. Independent claims 9, 19, and 22 require requesting said content from a remote client cache if said requested content is not in said local cache, wherein said content in said remote client cache was 25 *broadcast to a client*.

Thus, Carter et al. and Humphrey, alone or in combination, do not disclose or suggest storing content broadcast to a client in said client-side cache, as required by 25 independent claims 1, 15, 18, 20, 21, and 23, and do not disclose or suggest requesting said content from a remote client cache if said requested content is not in said local cache, wherein said content in said remote client cache was broadcast to a client, as required by independent claims 9, 19, and 22.

New Claims 24-27

30 New claims 24-27 have been added to more particularly point out and distinctly claim various features of the invention, consistent with the scope of the

originally filed specification, in order to give applicant the protection to which he is entitled. No new matter is introduced. Support for this material is set forth at pages 8 through 10 of the originally filed specification. Specifically, claims 24 and 26 require wherein said content broadcast to said client is broadcast prior to being requested by a 5 user. Claim 25 requires wherein said received content was predicted to be of interest to a user. Claim 27 requires wherein said content in said remote client cache was predicted to be of interest to a user.

Applicants note that Carter and Humphrey are directed to conventional Web caching where content is *cached in response to a request from a user* (Carter: col. 2, 10 line 38, to col. 3, line 14; Humphrey: paragraph 40). Claims 24 and 26 require that the content broadcast to said client is broadcast *prior to being requested*. Claims 25 and 27 require caching content that is *predicted to be of interest* to a user.

Thus, Carter et al. and Humphrey, alone or in combination, do not disclose or suggest wherein said content broadcast to said client is broadcast prior to being 15 requested, as required by claims 24 and 26, do not disclose or suggest wherein said received content was predicted to be of interest to a user, as required by claim 25, and do not disclose or suggest wherein said content in said remote client cache was predicted to be of interest to a user, as required by claim 27.

#### Dependent Claims 2-8, 10-14 and 16-17

20 Dependent claims 2-8, 10-13, and 16-17 were rejected under 35 U.S.C. §102(e) as being anticipated by Carter et al. and claim 14 was rejected under 35 U.S.C. §103(a) as being unpatentable over Carter et al. in view of Humphrey.

Claims 2-8, 10-14, and 16-17 are dependent on claims 1, 9, and 15, respectively, and are therefore patentably distinguished over Carter et al. and Humphrey 25 (alone or in any combination) because of their dependency from amended independent claims 1, 9, and 15 for the reasons set forth above, as well as other elements these claims add in combination to their base claim.

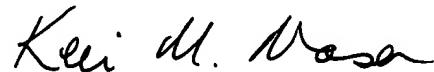
All of the pending claims, i.e., claims 1-23, are in condition for allowance and such favorable action is earnestly solicited.

If any outstanding issues remain, or if the Examiner has any further suggestions for expediting allowance of this application, the Examiner is invited to contact the undersigned at the telephone number indicated below.

The Examiner's attention to this matter is appreciated.

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Respectfully submitted,



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## Annotated Sheet Showing Changes

400

401

403

CATEGORY 1

CATEGORY N

401

CATEGORY LIST

402

WEB PAGE

WRAPPER

FIG. 4

FIG. 4 5

CENTRAL CACHE DIRECTORY - 500

520

530

540

	CONTENT ITEM IDENTIFIER	IP ADDRESS OF CLIENT PROVIDING ITEM	TIME-STAMPED OF CACHED CONTENT
501			
502			
503	⋮		